

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB  MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i>  Plaintiffs,  v.  National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc.,  Defendants.	Civ. Action No.: 14-cv-00029-AB
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**THE NATIONAL FOOTBALL LEAGUE AND NFL PROPERTIES LLC'S  
MOTION FOR THE APPOINTMENT OF A SPECIAL INVESTIGATOR**

The National Football League and NFL Properties, LLC (together, the "NFL Parties") respectfully move, pursuant to Federal Rule of Civil Procedure 53, for the immediate appointment of a Special Investigator to assist the Claims Administrator and the Court in investigating the submission of fraudulent claims to the NFL Concussion Settlement Program and recommending appropriate sanctions.

Dated: April 13, 2018

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

/s/ Brad S. Karp

Brad S. Karp

Bruce Birenboim

Lynn B. Bayard

Richard C. Tarlowe

Sarah A. Istel

1285 Avenue of the Americas

New York, NY 10019-6064

Tel: (212) 373-3000

Email: bkarp@paulweiss.com

*Attorneys for Defendants the National  
Football League and NFL Properties LLC*